



MASSACHUSETTS TURNPIKE AUTHORITY

State Transportation Building, 10 Park Plaza, Suite 5170, Boston, MA 02116

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July 27, 1993

Operator of the
Turnpike, Sumner and
Callahan Tunnels

ALLAN R. MCKINNON
Chairman

ANN M. HERSHFANG
Vice-Chairwoman

THOMAS J. CURLEY, JR.
Board Member

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Ms. Searcy:

On behalf of the Massachusetts Turnpike Authority (MassPike), I would like to support the comments filed by the International Bridge, Tunnel and Turnpike Association (IBTTA) which opposed the Notice of Proposed Rulemaking (NPRM), PR Docket 93-61, regarding the allocation of limited radio frequency for Electronic Toll and Traffic Management (ETTM) and other Intelligent Vehicle Highway Systems (IVHS) applications.

MassPike has been conducting one of the most comprehensive ETTM studies undertaken in the toll industry nationwide. This ETTM program includes, among other things, market studies and analyses, system design and procurement, and future traffic management applications. The opportunity exists, with the implementation of an ETTM system, to simultaneously enhance traffic monitoring capabilities, expand incident management detection systems, identify areas of congestion and measure travel speeds.

This NPRM would alter the regulations governing the use of Industrial, Scientific and Medical (ISM) applications operating in the range of 902 through 928 MHz. ETTM and Automatic Vehicle Identification (AVI) systems, applications of IVHS, also operate in this band.

MassPike shares the IBTTA's concerns regarding the potential result of granting exclusive use to a particular type of IVHS application, an Automatic Vehicle Monitoring (AVM) system, when existing and future ETTM operations could be disrupted. Further, in order to reap the public benefits of advanced transportation technologies which contribute to congestion relief, cleaner air and customer convenience, public transportation agencies and the toll industry must meet regional transportation and telecommunications needs in addition to implementing and operating reliable ETTM systems.

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While the actual implementation of an ETTM system on the Massachusetts Turnpike and at the Sumner Tunnel in Boston is not expected to begin until 1994, the initial planning and preliminary design of the system began nearly one year ago. Similar to other transportation agencies which are planning to implement ETTM systems in the near future, MassPike requests your attention to the potential impact of this action.